FCC Waiver Request

FCC Docket No. 02-6

Applicant Sandusky City School District (SCSD)

Billed Entity Number 129766
Form 471# 161048274
Form 472# 2706049
Funding Request Number 1699110163
SPIN 143005378

Contact Name Eric Spencer

Contact Address 611-G Park Meadow Road

Westerville, Ohio 43081

Telephone Number 614.882.0596 Fax Number 614.882.2556

E-Mail Address <u>eas@smserate.com</u>

Form Under Waiver Request

The Sandusky City School District (BEN – 129766) is requesting a waiver for the FCC program deadline of October 28, 2017 for the denial of payment of the Billed Entity Applicant Reimbursement Form:

Form 472# 2706049 Funding Request Number 1699110163 Line ID 8888483

An Appeal was filed with the Schools and Libraries Division on January 21, 2018 requesting a waiver for the above mentioned Form 472# 2706049. (Appeal attached). After submission, I was never contacted by the Schools and Libraries Division. On October 31, 2018, I contacted the Schools and Libraries Division's Client Service Bureau (CASE# 253935) to check on the status of the Appeal. I was told a Revised Funding Commitment Decision Letter (RFCDL) was issued on April 29, 2018 (RFCDL attached).

As the contact listed on the Appeal, I was never notified by the Schools and Libraries Division that a decision had been made and a Revised Funding

Commitment Decision Letter was issued. I was told the system, in error, sent the notification to the previous consultant. That individual has not been affiliated with our company, Strategic Management Solutions since December 31, 2016. Without receiving the notification that a Revised Funding Commitment Decision Letter was issued, we were unable to process the Form 472 in a timely manner.

The Sandusky City School District respectfully requests the FCC waive the program deadline of October 28, 2017 for the Billed Entity Applicant Reimbursement Form 472# 2706049 and restore Sandusky City School District's opportunity to submit the BEAR Form to the Schools and Libraries Division for payment for FRN 1699110163.

Thank you for your consideration in this matter.

Eric Spencer

Attachments:

Sandusky City School District Appeal Narrative
Sandusky City School District Revised Funding Commitment Decision Letter

Appeal Narrative

Applicant Sandusky City School District (SCSD)

Billed Entity Number 129766 Form 472# 2706049 Funding Request Number 1699110163

Contact Name Eric Spencer

Contact Address 611-G Park Meadow

Westerville, Ohio 43081

Telephone Number 614.882.0596 **Fax Number** 614.882.2556

Appealed Form

The Sandusky City School District (BEN – 129766) is requesting a waiver for the processing and denial of the Billed Entity Reimbursement Form:

Form 472# 2706049
Form 471# 161048274
Funding Request Number 1699110163
SPIN 143005378
Line ID 8888483

Appeal Background

October 17, 2017 – SCSD submitted BEAR Form Number 2706049 for FRN 1699110163 for Funding Year 2016 to USAC for payment (attached document - Form 472 - SAND-NET-2-16.pdf).

October 24, 2017 – The USAC invoice reviewer, Ms. Desiree Steward, contacted SCSD via email requesting the vendor invoice for our approved Basic Maintenance FRN (attached document – USAC Request – 10-24-2017.pdf).

October, 25, 2017 -- SCSD provided the paid Netech/Presidio invoice to Ms. Steward (attached document – Netech-Presidio Invoice.pdf).

December 8, 2017 – SCSD received the BEAR Form denial letter specifying the amount requested was not permissible under USAC rules (attached document – USAC BEAR Form Denial Letter.pdf).

October 25, 2017 through December 8, 2017 -- SCSD failed to receive any follow-up requests or communications from USAC requesting additional verification documentation. **USAC simply denied payment of the BEAR Form without further inquiry.**

Without any additional contact with SCSD, Ms. Steward apparently determined the Netech/Presidio invoice was not sufficient documentation to approve the SCSD BEAR Form. In all previous funding years, USAC has always provided applicants with an opportunity to correct any issues which may cause a denial of payment of a BEAR Form. In this case, the Reimbursement Request Decision Explanation was "Incomplete documents provided for review;".

Conclusion

SCSD purchased maintenance from Netech/Presidio through the E-Rate Program at a total cost of \$9,473.70. SCSD has included a letter from Mr. Matthew Stolz, Netech/Presidio Account Representative, which describes Netech/Presidio's Basic Maintenance service for SCSD (attached document – Matthew Stolz Letter.pdf). As Mr. Stolz explains, the basic maintenance purchased under the E-Rate Program includes both minor and major version software upgrades for the two Cisco 5508 Wireless Controllers. He further explains that in June, 2016, SCSD purchased the additional maintenance which is not eligible for E-Rate funding. This additional maintenance cost of \$13,507.58 is included in the \$22,981.28 shown on the Netech/Presidio invoice. The two additional line items on the invoice (\$3,261.28 and \$4,051.44, respectively) are for the additional maintenance purchased in June, 2016, and are also not eligible for E-Rate funding.

The Sandusky City School District respectfully requests USAC waive the denial of payment of BEAR Form 2706049 and restore Sandusky City School District's opportunity to submit the BEAR Form for payment for FRN 1699110163.

Thank you for your consideration in this matter.

Eric Spencer

Attachments: Form 472 - SAND-NET-2-16.pdf
USAC Request — 10-24-2017.pdf
Netech-Presidio Invoice.pdf
Form 472 (BEAR) Notification Letter.pdf
Matthew Stolz Letter.pdf)













View BEAR Invoice

PRINTABLE PAGE

Invoice ID: 2706049

Created on 10/16/2017 11:57 AM Last updated on 12/5/2017 5:01 AM

Applicant Form Identifier SAND-NET-2-16

Block 1: Header Information

Need Help?

1. Billed Entity Name SANDUSKY SCHOOL 2. Billed Entity Number

3. Service Provider

DISTRICT

129766

Identification Number (SPIN)

143005378

Applicant FCC Form 498 ID

443014529

4. Contact Name **ERIC SPENCER**

5. Contact Telephone Phone

(614)882-0596

Contact Fax

(614)882-2556

Contact Email

eas@smserate.com

6. Total Reimbursement Amount (total from Block 2, Column 14)

\$ 49029.91

Block 2: Line Item Information Per Funding Request Number

Need Help?

7. FCC Form 471 Application Number (from Fundin	• (9. Bill Frequency	10. Customer Billed Date	date to Customer or Last Day of Work Performed	12. Total (Undiscounted) Amount for Service	13. Discount Rate	14. Discount Amount Billed to USAC (Column 12 multiplied by Column 13)	Approval Status
Commitment Decision Letter)	Funding Commitment Decision Letter)			(mm/dd/yyyy)				
1) 161048274	1699110154 (ONE-TIME	7/1/2016		\$ 17652.88	5	\$ 15004.95	COMPLETED
2) 161048274	1699110141 (ONE-TIME	7/1/2016		\$ 30555.60	5	\$ 25972.26	COMPLETED
3) 161048274	1699110163 (ONE-TIME	7/1/2016		\$ 9473.76	5	\$ 8052.70	COMPLETED

Block 3: Billed Entity Certification

Need Help?

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form. To see a copy of the Terms and Conditions to which you provided as the conditions of the Terms and Conditions of t

Submission Date 10/17/2017

17. Name GINA DEPPERT18. Title/Position TREASURER20. Address 1 407 DECATUR

Address 2

City SANDUSKY

State OH

Zip Code 44870 - 2442

19. Phone Number (419) 626-6940 **19a. Fax Number** (419) 621-2784

19b. EmailGDEPPERT@SCS-K12.NET19c. Name of AuthorizedSANDUSKY CITY SCHOOLS

Person's Employer

OMB Number 3060 - 0856 Form 472

SLD Home | Contact Us

Client Service Bureau: 1-888-203-8100

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Eric Spencer

From: Steward, Desiree < Desiree. Steward@sl.universalservice.org>

Sent: Tuesday, October 24, 2017 8:38 AM

To: Eric Spencer

Cc: ERIC SPENCER@1614-882-2556

Subject: Erate SLD 2706049 Bear REF: SAND-NET-2-16

Follow Up Flag: Follow up Flag Status: Completed

SLD Invoice No	SP_App Invoice No	Line ID	Customer Billed Date	471	FRN	SPIN	Service Pro Name
2706049	SAND-NET-2- 16	8888483	01-Jul-16	161048274	1699110163	143005378	Netech Corporation

I am reviewing your request for reimbursement of the invoice line/s noted above.

BILLS:

Please submit:

- I. A copy of the summary page/s for the bill/s received from Service Provider, to show:
 - a) Bill Date / Ship Date,
 - b) Service Provider Name,
 - c) Bill-To Entity,
 - d) Current Charges,
 - e) Description of Products / Services Delivered:

Please provide

- 1. Description of products / services when not indicated on bill,
- 2. List of equipment being maintained,
- 3. Hours of work performed.
- II. If the invoice is for deposits or up-front charges for services, please include a copy of the full contract that supports those charges.

RESPONSE REQUIREMENT:

Please provide this information to me as soon as possible within the next 7 calendar days, by End of Day Tuesday, 10/31/2017. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event, please ensure you have all necessary documents collected before resubmitting your request. If you have any questions, please contact me within this 7 day period.

Thank you for your cooperation and continued support of the Universal Service Program.

Desiree Steward

Case Management, Invoicing Team, Schools and Libraries Program

30 Lanidex Plaza West | Parsippany, NJ 07054 T: 973.581.7645 | F: 973.599.6539

Desiree.Steward@sl.universalservice.org

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may contain information that is privileged and confidential and subject to legal restrictions and penalties regarding its unauthorized disclosure or other use. If you are not the intended recipient, you are hereby notified that any disclosure, copying, distribution, or the taking of any action or inaction in reliance on the contents of this e-mail and any of its attachments is STRICTLY PROHIBITED. If you have received this e-mail in error, please immediately notify the sender via return e-mail; delete this e-mail and all attachments from your e-mail system and your computer system and network; and destroy any paper copies you may have in your possession. Thank you for your cooperation.

Eric Spencer

From: Eric Spencer

Sent: Wednesday, October 25, 2017 3:34 PM

To: 'Steward, Desiree'

Subject: RE: Erate SLD 2706049Bear REF: SAND-NET-2-16 **Attachments:** Sandusky SLD Invoice 2706049 Documentation.pdf

Desiree,

Attached is the documentation requested. Please let me know if there is anything additional I can provide.

Thanks!

Eric

From: Steward, Desiree [mailto:Desiree.Steward@sl.universalservice.org]

Sent: Tuesday, October 24, 2017 8:38 AM **To:** Eric Spencer <eas@smserate.com>

Cc: ERIC SPENCER@1614-882-2556 <IMCEAFAX-ERIC+20SPENCER+401614-882-2556@solixinc.com>

Subject: Erate SLD 2706049 Bear REF: SAND-NET-2-16

SLD Invoice No	SP_App Invoice No	Line ID	Customer Billed Date	471	FRN	SPIN	Service Pro Name
2706049	SAND-NET-2- 16	8888483	01-Jul-16	161048274	1699110163	143005378	Netech Corporation

I am reviewing your request for reimbursement of the invoice line/s noted above.

BILLS:

Please submit:

- I. A copy of the summary page/s for the bill/s received from Service Provider, to show:
 - a) Bill Date / Ship Date,
 - b) Service Provider Name,
 - c) Bill-To Entity,
 - d) Current Charges,
 - e) Description of Products / Services Delivered:

Please provide

- 1. Description of products / services when not indicated on bill,
- 2. List of equipment being maintained,
- 3. Hours of work performed.
- II. If the invoice is for deposits or up-front charges for services, please include a copy of the full contract that supports those charges.

RESPONSE REQUIREMENT:

Please provide this information to me as soon as possible within the next 7 calendar days, by End of Day Tuesday, 10/31/2017. Failure to do so may result in a reduction or rejection of the invoice, without further request. In this event,





Sandwelery Schools REQUISITION FORM

School/Building: BO	Ach.				
1190 Budget Account: 00/ - 2900 - 490 -	Department:				
Vendor: Presidio (formuly Notich) Address: 20 N. Staint Clair 3rd foor City: 10 hello State: 0 H zip+4: 1994 43604	Requisition Number				
Phone: (419) 214 411 Fax: : ()	Toll Free:				
Quantity Item Description	Unit Price Cost				
Maintanence Savice					
- Cisco Wireless LAN Con - Network Support - Erate ReImburser eligible Fore \$ 9473.70					
Requested by: Eric Eckerrode South Date: 7/11/16 Approved by: Date: 7-12-16					
Office Use: Requisition Not Entered: Exceeds budget/Available Cash/No budget account (Forward to Tre No Vendor on File (Forward to Business Office) No Account Access (Forward to Business Office)	casurer)				

6355 East Paris Ave. SE Caledonia, MI 49316 Tel. 616. 871. 1500 | Fax. 616. 871.1670 www.Presidio.com

Netech-Presidio Invoice.pdf

REMIT PAYMENT TO

Presidio Infrastructure Solutions LLC P.O Box 99613 Troy, MI 48099-9613

PAID AUG 3 1 2016

Invoice

Invoice No.	141236	
Customer No.	SAN100	\dashv

Bill To

Sandusky City Schools Attn Payables 407 Decatur St Sandusky, OH 44870-2442 US

Ship To

Sandusky City Schools Attn Eric Eckenrode 407 Decatur St Sandusky. OH 44870-2442 US

Contact:

Telephone:

E-mail:

Contact:

Telephone:

45 III a	···			E-mail:		
Invoice Date	Order Date	SO Number	Ordered By	Customer PO Number	Paym	nent Method
07/29/16	07/26/16	115756	Sandusky City Schools	13937		Net 30
Warehou	se Invoice	Delivery Method	F.O.B.	Salesperson		CW SO #
NOVI	eMail Cus	stomer	Shipping Point	Bill Murray	73695	C 11 50 11
Order Quantity	Ship Quantity		Item Number / Descripti	ion	Unit Price	Extended Price
1.00	1.00	NET-C4P-12547	7110 U of I	M: EA	22.981.28	22.981.28

NOVI		Customer	Shipping Point		Bill Murray	73695	0,, 00,,
Order Quantity	Ship Quantity		Item Number / Description			Unit Price	Extended Price
1.00	1.00	NET-C4P-12: Presidio Adva	547110 nced Coverage 24x7x4 Ons	U of M: EA		22.981.28	22.981.28
1	1	CON-SAU-12 Cisco Smartne	2548500 et SW Support + Upgrades	U of M: EA		3,261.28	3.261.28
1.00	1.00	NET-SNT-12: Presidio Adva	547110 nced Coverage 8x5xNBD	U of M: EA		4,051.44	4,051.44
THE PROPERTY OF THE PROPERTY O							

Print Date	07/29/16
Print Time	02:39:39 PM
Page No.	
	1

Total Paid	0.00
Balance Due	30,294.00
Due Date	08/28/16

Subtotal	30,294.00
Freight	0.00
Invoice Total	30,294.00

Printed By: Steven Hirsch



Schools and Libraries Division



Form 472 (BEAR) Notification Letter

December 8, 2017

Katie Mackinnon Presidio Infrastructure Solutions LLC 6355 East Paris Ave Caledonia, MI 49316

Re: Invoice Number - as assigned by USAC: 2706049 Service Provider Identification Number: 143005378

Reimbursement Form Number: SAND-NET-2-16

Billed Entity Number: 129766

Spencer Eric SANDUSKY SCHOOL DISTRICT 611-G Park Meadow Rd Westerville, OH 43081

> Preferred Mode of Contact: E-mail at eas@smserate.com Total Amount of ReimbursementApproved for Payment: \$40977.20

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR using the BEAR Online tool from the Apply Online area or Required Forms section of our website to request reimbursement for any unpaid lines.

If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

TO APPEAL THIS DECISION:

If you wish to appeal a decision in this letter to USAC, your appeal must be received by USAC or postmarked within 60 days of the date of this letter. Failure to meet this requirement will result in automatic dismissal of your appeal. In your letter of appeal:

- 1. Include the name, address, telephone number, fax number, and email address for the person who can most readily discuss this appeal with us.
- 2. State outright that your letter is an appeal. Include the following to identify the USAC decision letter (e.g., FCDL) and the decision you are appealing:
 Appellant name,
- Applicant name and service provider name, if different from appellant,

Schools and Libraries Division - Correspondence Unit 30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685 Visit us online at: www.usac.org/sl

- Applicant BEN and Service Provider Identification Number (SPIN), - FCC Form 471 Application Number and the Funding Request Number (FRN) or Numbers as assigned by USAC, - "Funding Commitment Decision Letter for Funding Year 2015," AND

- The exact text or the decision that you are appealing.
- 3. Please keep your letter to the point, and provide documentation to support your appeal. Be sure to keep a copy of your entire appeal, including any correspondence and documentation.
- 4. If you are the applicant, please provide a copy of your appeal to the service provider(s) affected by USAC's decision. If you are the service provider, please provide a copy of your appeal to the applicant(s) affected by USAC's decision.
- Provide an authorized signature on your letter of appeal.

We strongly recommend that you use one of the electronic filing options. To submit your appeal to USAC by email, email your appeal to appeals@sl.universalservice.orgr submit your appeal electronically by using the "Submit a Question" feature on the USAC website. USAC will automatically reply to incoming emails to confirm receipt.

To submit your appeal to USAC by fax, fax your appeal to (973) 599-6542. To submit your appeal to USAC on paper, send your appeal to:

Letter of Appeal Schools and Libraries Division - Correspondence Unit 30 Lanidex Plaza West PO Box 685 Parsippany, NJ 07054-0685

For more information on submitting an appeal to USAC, please see "Appeals" in the Schools and Libraries section of the USAC website.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division Universal Service Administrative Company

CC: SANDUSKY SCHOOL DISTRICT

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 161048274 Funding Request Number: 1699110141 Funding Year 2016: 07/01/2016 - 06/30/2017 Contract Number: Funding Commitment Decision: \$25972.26

Reimbursement Amount for this FRN: \$25972.26

Form 471 Application Number: 161048274 Funding Request Number: 1699110154 Funding Year 2016: 07/01/2016 - 06/30/2017 Contract Number: Funding Commitment Decision: \$15004.94 Reimbursement Amount for this FRN: \$15004.94 Reimbursement Request Decision Explanation: Partial Paymnt, Inv > Remaining Commitment;

Incomplete documents provided for review;

Form 471 Application Number: 161048274 Funding Request Number: 1699110163 Funding Year 2016: 07/01/2016 - 06/30/2017 Contract Number: Funding Commitment Decision: \$8052.70 Reimbursement Amount for this FRN: \$0.00 Reimbursement Request Decision Explanation:





December 30, 2017

Dear USAC,

Presidio Networked Solutions Group (SPIN # 143005378) contracted with Sandusky City Schools to provide Basic Maintenance of their two Cisco 5508 Wireless Controllers in the amount of \$9,473.70. Our Basic Maintenance Service includes major and minor version software upgrades at a cost of \$4,736.85 per unit (Part Number CON-SW-CT08250).

In June, 2016, Sandusky City Schools decided to purchase additional maintenance services for their two Cisco 5508 Wireless Controllers that provides overnight replacement of parts upon hardware failure and 24x7x4 technical support. The cost of this additional maintenance was \$13,507.58 (\$6,753.79 per unit) for a total cost of \$22,981.28 (Maintenance Part Number NET-OSP-CT08250 / Item Number NET-C4P-12547110).

Per E-Rate program rules, this additional maintenance cost of \$13,507.58 for their two Cisco 5508 Wireless Controllers is not eligible for funding.

Please let me know if you have any additional questions.

Sincerely,

Matthew R. Stolz Account Executive



Revised Funding Commitment Decision Letter

Funding Year 2016

Contact Information:

Gina Deppert
SANDUSKY SCHOOL DISTRICT
407 DECATUR ST
SANDUSKY, OH 44870
gdeppert@scs-k12.net

BEN: 129766

Post Commitment Wave: 46

Totals

Original Commitment Amount	\$8,052.70
Revised Commitment Amount	\$8,052.65

What is in this letter?

Thank you for submitting your post-commitment request for Funding Year 2016 Schools and Libraries Program (E-rate) funding. Attached to this letter, you will find the revised funding statuses and/or post commitment changes to the original Funding Commitment Decision Letter (FCDL) you received. Below are the changes that were made:

Appeals

The Universal Service Administrative Company (USAC) is providing this information to both the applicant(s) and the service provider(s) so that all parties are aware of the post-commitment changes related to their funding requests and can work together to complete the funding process for these requests.

Next Steps

File the FCC Form 486, Service Confirmation and Children's Internet Protection Act (CIPA)
 Certification Form, for any FRNs included in this RFCDL, if you have not already done so. Please
 review the CIPA requirements and file the form(s).



BEN: 129766

Post Commitment Wave: 46

 If USAC approved funding on an FRN in your original FCDL, the deadline to submit the FCC Form 486 is 120 days from the date of the original FCDL or from the service start date (whichever is later).

- o If a new FRN was created for this RFCDL or funding was not approved on an FRN in your original FCDL but is approved in this RFCDL, the deadline to submit the FCC Form 486 is 120 days from the date of this RFCDL or from the service start date (whichever is later).
- 2. **Invoice USAC**, if you or your service provider have not already done so. Work with your service provider(s) to determine if your bills will be discounted or if you will request reimbursement from USAC after paying your bills in full.
 - If you (the applicant) are invoicing USAC: You must pay your service provider(s) the
 full cost for the services you receive and file the <u>FCC Form 472</u>, the Billed Entity Applicant
 Reimbursement (BEAR) Form, to invoice USAC for reimbursement of the discounted amount.
 - If your service provider(s) is invoicing USAC: The service provider(s) must provide services, bill the applicant for the non-discounted share, and file the <u>FCC Form 474</u>, the Service Provider Invoice (SPI) form, to invoice USAC for reimbursement for the discounted portion of costs.
 Every funding year, service providers must file an <u>FCC Form 473</u>, the Service Provider Annual Certification Form, to be able to submit invoices and to receive disbursements.
 - To receive an invoice deadline extension, the applicant or service provider must request an
 extension on or before the last date to invoice. If you anticipate, for any reason, that invoices
 cannot be filed on time, USAC will grant a one-time, 120-day invoice deadline extension if
 timely requested.

How to Appeal or Request a Waiver of a Decision

You can appeal or request a waiver of a decision in this letter **within 60 calendar days** of the date of this letter. Failure to meet this deadline will result in an automatic dismissal of your appeal or waiver request.

Note: The Federal Communications Commission (FCC) will not accept appeals of USAC decisions that have not first been appealed to USAC. However, if you are seeking a waiver of E-rate program rules, you must submit your request to the FCC and not to USAC. USAC is not able to waive the E-rate program rules.

- To submit your appeal to USAC, visit the Appeals section in the E-rate Productivity Center (EPC)
 and provide the required information. USAC will reply to your appeal submissions to confirm receipt.
 Visit USAC's website for additional information on submitting an appeal to USAC, including step-by-step instructions.
- To request a waiver of the FCC's rules or appeal USAC's appeal decision, please submit
 it to the FCC in proceeding number CC Docket No. 02-6 using the <u>Electronic Comment Filing</u>
 <u>System</u> (ECFS). Include your contact information, a statement that your filing is a waiver request,



BEN: 129766

Post Commitment Wave: 46

identifying information, the FCC rule(s) for which you are seeking a waiver, a full description of the relevant facts that you believe support your waiver request and any related relief, and any supporting documentation.

For appeals to USAC or to the FCC, be sure to keep a copy of your entire appeal, including any correspondence and documentation, and provide a copy to the affected service provider(s).

Obligation to Pay Non-Discount Portion

Applicants are required to pay the non-discount portion of the cost of the eligible products and/or services to their service providers. Service providers are required to bill applicants for the non-discount portion of costs for the eligible products and/or services. The FCC stated that requiring applicants to pay the non-discounted share of costs ensures efficiency and accountability in the program. If using the BEAR invoicing method, the applicant must pay the service provider in full (the non-discount plus discount portion) **before** seeking reimbursement from USAC. If using the SPI invoicing method, the service provider must first bill the applicant **before** invoicing USAC.

Notice on Rules and Funds Availability

The applicants' receipt of funding commitments is contingent on their compliance with all statutory, regulatory, and procedural requirements of the Schools and Libraries Program and the FCC's rules. Applicants who have received funding commitments continue to be subject to audits and other reviews that USAC and/or the FCC may undertake periodically to assure that funds that have been committed are being used in accordance with such requirements. USAC may be required to reduce or cancel funding commitments that were not issued in accordance with such requirements, whether due to action or inaction, including but not limited to that by USAC, the applicant, or the service provider. USAC, and other appropriate authorities (including but not limited to the FCC), may pursue enforcement actions and other means of recourse to collect improperly disbursed funds.

April 29, 2018 **Revised** 3



BEN: 129766

Post Commitment Wave: 46

Revised Funding Commitment Decision Overview

Funding Year 2016

Funding Request Number (FRN)	Service Provider Name	Request Type	Revised Committed	Review Status
1699110163	Presidio Infrastructure Solutions LLC	Appeals	\$8,052.65	Approved

April 29, 2018 Revised 4



BEN: 129766

Post Commitment Wave: 46

Post Commitment Request Number:	Post Commitment Request Type:	Post Commitment Decision:
88337	Appeals	Approved

FRN:	Service Type: Basic Maintenance of Internal Connections	Original Status:	Revised Status:
1699110163		Funded	Funded
FCC Form 471: 161048274			

Dollars Committed				
Monthly Cost		One-Time Cost		
Months of Service	12			
Total Eligible Recurring Charges	\$9,473.76	Total Eligible One Time Charges	\$0.00	
Total Pre-Discount Charges		\$9,473.76		
Discount Rate		85.00%		
Revised Committed Amount		\$8.052.65		

Dates	
Service Start Date	7/1/2016
Contract Expiration Date	6/30/2017
Contract Award Date	5/16/2016
Service Delivery Deadline	6/30/2017
Expiration Date (All Extensions)	

Service Provider and Contract Information		
Service Provider	Presidio Infrastructure Solutions LLC	
SPIN (498ID)	143005378	
Contract Number		
Account Number		
Establishing FCC Form 470	160034711	

Consultant Information	
Consultant Name	Randy Black
Consultant's Employer	Strategic Management Solutions
CRN	16054698

Revised Funding Commitment Decision Comments:

Post Commitment Rationale:

Based on your appeal letter and the relevant documentation, your appeal is approved and you have 30 days from the date of this notification to submit an invoice. Please note that when invoice documentation is requested all listed items (make and model of equipment, hours of work performed) must be included in your response.